

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE CITIGROUP  
SECURITIES LITIGATION

No. 07 Civ. 9901 (SHS)  
**ECF Case**

**NOTICE OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT AND APPROVAL OF PLAN OF ALLOCATION**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Orders dated August 29, 2012, September 6, 2012 and September 28, 2012, on preliminary approval of the proposed settlement and providing for notice, and upon the Joint Declaration of Ira M. Press and Peter S. Linden in Support of (A) Plaintiffs' Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation and (B) Plaintiffs' Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of Proposed Class Action Settlement and Approval of Plan of Allocation; the Declaration of Former United States District Court Judge Layn R. Phillips Regarding Approval of Settlement; the Declaration of John C. Coffee, Jr.; the Declaration of Geoffrey P. Miller; and all other papers and proceedings herein, Plaintiffs will and do hereby move this Court on January 15, 2013, at 10:00 a.m. in the Courtroom of the Honorable Sidney H. Stein, United States District Judge for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, New York 10007, or other such location and time as set by the Court, for entry of a Judgment approving the

Settlement as fair, reasonable and adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable. A [Corrected and Proposed] Final Judgment and Order of Dismissal with Prejudice is attached hereto.

Dated: December 7, 2012

Respectfully Submitted,

**KIRBY McINERNEY LLP**

By: /s/ Ira M. Press

Ira M. Press

Peter S. Linden

Andrew S. McNeela

Mark A. Strauss

Beverly Tse Mirza

825 Third Avenue, 16th Floor

New York, NY 10022

Tel: (212) 371-6600

Fax: (212) 751-2540

*Lead Counsel for Plaintiffs*